

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

BAILEY KOWALSKI,)	
)	
Plaintiff,)	
)	Civil Action No. 1:18-cv-00390
v.)	
)	Hon. Paul L. Maloney
MICHIGAN STATE UNIVERSITY)	
and UNIDENTIFIED ROES,)	
)	
Defendants.)	

**MICHIGAN STATE UNIVERSITY’S MOTION FOR LEAVE TO FILE A REPLY
MEMORANDUM IN SUPPORT OF ITS MOTION TO RECONSIDER
OR, ALTERNATIVELY, TO CERTIFY FOR AN IMMEDIATE APPEAL
PURSUANT TO 28 U.S.C. § 1292(B)**

Pursuant to Rule 7.3(c) of the Local Rules for the United States District Court for the Western District of Michigan, Defendant Michigan State University, through its undersigned counsel, respectfully moves this Court for leave to file a Reply Memorandum of Law in Support of its Motion to Reconsider or, Alternatively, to Certify for an Immediate Appeal Pursuant to 28 U.S.C. § 1292(b) (Dkt. 47). A copy of the proposed Reply Memorandum is attached as Exhibit A to this Motion. The Reply Brief is under five pages in length, responds only to specific arguments raised in the Plaintiff’s opposition brief to their motion, and is necessary to clarify the law and defendant’s position in response to Plaintiff’s arguments. Counsel for MSU sought concurrence from counsel for Plaintiff on June 2, 2020, and counsel for Plaintiff responded that she does not oppose this Motion to file a Reply.

Date: June 4, 2020

Respectfully submitted,

s/ Michael E. Baughman

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CERTIFICATE OF SERVICE

I certify that on the 4th of June, 2020, I electronically filed the foregoing Michigan State University's Motion for Leave to File a Reply Memorandum, with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

Respectfully submitted,

s/ Michael E. Baughman

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